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2
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OCT 19 1984

O. L. Olson
 Project Manager
 Basalt Waste Isolation
 Project Office
 U. S. Department of Energy
 P. O. Box 550
 Richland, WA 99352

WM Record File
101.2

WM Project 10
 Docket No. _____
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PDR
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Dear Mr. Olson:

I am writing about some problems that I see in NRC/DOE interactions on BWIP hydrology.

Recently, it was suggested by your staff that a review meeting on BWIP hydrology might be desirable in the October-November time frame. In principle, we are sympathetic to this suggestion. It is consonant with the "periodic consultation and review" concept in the hydrologic testing strategy at BWIP, as agreed in July 1983.

However, I am inclined to think that we should first consider the effectiveness of past interactions and include in a plan for any future activity DOE responses to the past NRC comments on hydrology. Specifically, I am concerned about the apparent lack of attention to our previous comments on BWIP hydrologic investigations. Five hydrology comment letters were sent to you during the period from November 4, 1983 to May 24, 1984, but no responses were received. By prior understanding with your staff, the letters were an agenda item for discussion at the June 12-13, 1984 hydrology workshop. However, at the workshop, DOE and its contractor were unprepared to discuss the subject. The DOE spokesman proposed that the matter be handled as expressed in the item below, taken from the minutes of that meeting:

"DOE will provide a plan and schedule for addressing the (five NRC hydrology) letters by July 1984."

Beginning in late July, and several times since, I have been informed by the DOE BWIP staff that the plan and schedule was about to be mailed and/or telefaxed. However, as of this date, nothing has been received.

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Further, another understanding from the June meeting is:

"During August 1984, DOE will describe its strategy for field measurement of vertical hydraulic conductivity, including wells and intervals involved in testing."

As of this date, nothing has been received.

We appreciate the fact that it is sometimes difficult to fulfill obligations on the schedule originally planned. For example, our written follow-up comments on the workshop were to be delivered during August; in fact, they will go out this week.

Nevertheless, DOE's apparent inability to respond to NRC concerns in a reasonable time suggests that the present method of interaction may not be achieving the consultative relationship expected during the pre-licensing stage. As a result, I may not be able to command the NRC technical support needed for the proposed meeting on hydrology, because of requests from other projects in both high-level and low-level waste.

May I have your views on this.

Sincerely,

ORIGINAL SIGNED BY

Robert J. Wright, Senior Technical Advisor
Repository Projects Branch
Division of Waste Management
Office of Nuclear Material Safety
and Safeguards

cc: William Bennett, DOE-HQ

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